

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>STATE OF OHIO,</b>	:	<b>CASE NO. 4:23-cv-00517-JRA</b>
	:	
<b>UNITED STATES OF AMERICA,</b>	:	<b>JUDGE JOHN R. ADAMS</b>
	:	
<b>Plaintiffs,</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>NORFOLK SOUTHERN CORPORATION, et al.,</b>	:	
	:	
<b>Defendants.</b>	:	

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**STATE OF OHIO’S STATUS REPORT**

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On April 15, 2024, the Court issued an Order directing the parties to file Status Reports every thirty days, addressing: (1) discovery that has occurred during the reporting period; (2) settlement discussions that have occurred during the reporting period; (3) motions that have been filed or remained pending during the reporting period; and (4) any developments that might give rise to a request to deviate from the schedule outlined in the case management plan.

Since the filing of the last status report on June 14, 2024, the State’s responses are respectfully submitted below.

**1. Discovery**

Ohio served its First Set of Requests for Admissions, Interrogatories, and Request for Documents on Defendants on April 17, 2024. Ohio and Defendants have conferred and agreed to a rolling production. Ohio received the first document production on June 14, 2024 and a second production on July 3, 2024.

Additionally, Ohio served third-party subpoenas on OxyVinyls LP, GATX Corp., and Trinity Industries Leasing Co., and received productions in accordance with those subpoenas.

## **2. Settlement Discussions**

Ohio made a settlement demand on July 12, 2024.

## **3. Motions Filed or Pending**

No motions have been filed or remain pending during the most recent reporting period.

## **4. Potential Deviations from Case Management Schedule**

Ohio is not aware of any developments that might give rise to a request to deviate from the Case Management Schedule.

Respectfully submitted,

DAVE YOST  
OHIO ATTORNEY GENERAL

s/ Amber Wootton Hertlein

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**Certificate of Service**

This certifies that on July 15, 2024, I served State of Ohio's Status Report by filing through the Court's CM/ECF system, which electronically notified all parties of record.

s/ Amber Wootton Hertlein

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